



November 28, 2005

**VIA ECFS**

Marlene H. Dortch, Secretary  
Federal Communications Commission  
445 12th Street, SW, Washington, DC 20554.

**Re: Compliance Letter – Super-Net, Inc.  
WCB Docket Nos. 04-36 and 05-196**

Dear Ms, Dortch:

Super-Net, Inc. (“Super-Net”), through counsel, hereby submits it compliance letter in response to the Enforcement Bureau’s November 7, 2005 Public Notice in the above-referenced proceedings.

Super-Net is able to provide 911 service in compliance with the rules established in the *VoIP Order*<sup>1</sup> to 100% of Super-Net’s Digital Phone service subscribers. Through contractual relationships with other interconnected telecommunication service providers, Super-Net is able to transmit all 911 calls of subscribers to its Digital Phone service to the appropriate Public Service Answering Point (“PSAP”). Through these same contractual relationships, Super-Net transmits 100% of its callers’ ANI and Registered Location to all answering points that are capable of receiving and processing this information. Super-Net does not provide its Digital Phone service to consumers unless it has the ability to transmit 911 calls to the PSAP.

Super-Net has obtained each existing subscriber’s current Registered Location and each new subscriber’s initial Registered Location as part of its deployment of service. Notably, Super-Net’s service is not nomadic, and may only be used from the registered location. Subscribers may update their Registered Location as part of administering their account.

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<sup>1</sup> IP-Enabled Services and 911 Requirements for IP-Enabled Service Providers, First Report and Order and Notice of Proposed Rulemaking, 20 FCC Rcd 10245 (2005) (“*VoIP Order*”).

A detailed summary of Super-Net, Inc.'s compliance with the Commission's VoIP 911 regulations is attached hereto. If you have any questions or need additional information regarding Super-Net's compliance efforts, please contact the undersigned.

Sincerely,

A handwritten signature in black ink, appearing to read "M. Hazzard", with a large circular flourish at the bottom.

Michael B. Hazzard

Counsel to Super-Net, Inc.

Attchment

cc: Service List

## ATTACHMENT A

### SUPER-NET COMPLIANCE LETTER WC DOCKET NOS. 04-36 AND 05-196

Super-Net, Inc. provides 911 service to its Voice over Internet Protocol (VoIP) customers through contractual arrangements with an underlying network operator as follows:

**NETWORK OVERVIEW** – Super-Net's network operator provides a traditional E911 service for all of Super-Net's VoIP over cable deployments. Super-Net's network operator has established interconnection trunks to the incumbent carriers the rate centers in which Super-Net provides its VoIP service. These interconnection trunks include connections to any selective routers serving that area which the network operator relies on to tandem the E911 calls to the Public Safety Answering Point (PSAP), or direct connections to the PSAP should there be no selective router.

Super-Net's network operator has provided for complete redundancy and diversity at every point in the network including, but not limited to: transport diversity on different SONET rings; completely redundant trunk groups assigned to redundant carrier facilities; default routing for any events of trunk group failure, ANI failure, ALI/SR database failure, no record found condition, or failure of the primary selective router tandem switch. Super-Net's network provider supports either Signaling System 7 (SS7) or Multi-Frequency (MF) trunk signaling requirements to the selective router. These E911 trunks are managed 24 X 7, tracked for utilization, and augmented as necessary. Finally, the network provider's operator support team has the ability to forward E911 calls to the appropriate PSAP should a subscriber accidentally dial the operator by mistake.

#### **ALI Database Update**

After the VoIP customer's service has been established, the network operator provides the E911 ALI record information to the PSAP's ALI database provider. The subscriber's E911 address is pre-validated against the Master Street Address Guide (MSAG). Changes to the subscriber's information affecting 911 data are submitted to the PSAP's ALI database provider as updates to the record. Records failing to update in the ALI database are returned to network operator for correction and resubmission to the database.

As noted above, Super-Net, Inc. relies on contractual arrangements with a network provider for compliance with E911 requirements. Working in conjunction with our network operator, we:

- Provide 911 service to 100% of our subscribers
- Transmit 100% of 911 calls to the appropriate PSAP.
- Transmit all (100%) caller's ANI and Registered Location information to all (100%) answering points that are capable of receiving and processing this information.
- Obtain Registered Location information from 100% of all customers.
- Do not offer nomadic service.

**CERTIFICATE OF SERVICE**

I, G. Hiroko Taguchi, a secretary in the law firm of Womble Carlyle Sandridge & Rice, PLLC, do hereby certify that true copies of the foregoing "Compliance Letter" were sent this 28<sup>th</sup> day of November, 2005 via U.S. Mail, postage prepaid, to the following:

Kathy Berthot  
Deputy Chief  
Spectrum Enforcement Division  
Enforcement Bureau  
Federal Communications Commission  
Room 7-C802  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Janice Myles  
Competition Policy Division  
Wireline Competition Bureau  
Federal Communications Commission  
Room 5-C140  
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G. Hiroko Taguchi